

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Todd A. Brunner and
Sharon Y. Brunner,

Case No. 11-29064
Chapter 11

Debtors.

APPLICATION TO APPROVE THE
EMPLOYMENT OF APPRAISER FOR THE DEBTORS

Todd A. Brunner and Sharon Y. Brunner, Debtors and Debtors-in-Possession, request that the Court enter an *Order* authorizing the employment of Nelida Valentin of Valentin Appraisals as an appraiser in these proceedings under the terms and conditions described in this *Application*.

1. The Debtors filed a *Petition* for Relief under Chapter 11 of Title 11, United States Code on June 5, 2011, and are operating their business as the Debtors-in-Possession.
2. The Debtors have selected Nelida Valentin of Valentin Appraisals to appraise the Debtors' real estate in this Chapter 11 proceeding, subject to the approval of the Bankruptcy Court.
3. The Debtors have selected the appraiser because it has substantial experience in valuing assets of the type held by the Debtors and because of the reasonableness of their fees considering the extensiveness of the Debtors' real estate holdings.

Law Offices of Jonathan V. Goodman
135 West Wells Street - Suite 340
Milwaukee, WI 53203-1807
PH: (414) 276-6760 - FX: (414) 287-1199
e-mail: jgoodman@ameritech.net

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4. The professional services to be rendered by the proposed appraiser are to appraise the Debtors' real estate and to provide expert testimony in connection with their opinion as to their value.

5. The Debtors are informed that the appraiser will charge \$200.00 per property for such work. There are approximately 250 properties which mean a fee cap of \$50,000.00. A retainer of \$10,000.00 is requested subject to disgorgement.

6. To the best of the Debtors' knowledge, the appraiser has no connection with any parties-in-interest or their respective attorneys in this proceeding, except as disclosed in its *Affidavit of Disinterestedness*.

7. The appraiser represents no interest adverse to Debtors and Debtors-in-Possession, or in the matters in which it is engaged by Debtors as Debtors-in-Possession, and its employment would be in the best interest of this estate.

WHEREFORE, your applicant prays that it be authorized to employ and appoint the said appraiser to do appraisal services for the Debtors-in-Possession in this proceeding under Chapter 11 of Title 11, United States Code, and that it have such other and further relief as is just.

Dated this 09 day of June, 2011.

LAW OFFICES OF JONATHAN V. GOODMAN
Attorneys for the Debtors

/s/
Jonathan V. Goodman

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Milwaukee, WI 53203-1807
PH: (414) 276-6760 - FX: (414) 287-1199
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